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David J. Sheehan
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Presentment Date: April 26, 2021
Time: 12:00 p.m.

Objections Due: April 26, 2021
Time: 11:00 a.m.

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**NOTICE OF PRESENTMENT OF TRUSTEE'S APPLICATION
FOR AN ORDER APPROVING THE RETENTION OF
TRAVERS THORP ALBERGA AS SPECIAL COUNSEL**

PLEASE TAKE NOTICE that Irving H. Picard, as trustee (the "Trustee") for the liquidation of the business of Bernard L. Madoff Investment Securities LLC ("BLMIS") under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* ("SIPA"), and the substantively consolidated estate of Bernard L. Madoff, by the Trustee's undersigned counsel, will present an order approving the retention of Travers Thorp Alberga as special counsel, a copy of which is

annexed hereto as Exhibit A (the “Order”), to the Honorable Cecelia G. Morris, Chief United States Bankruptcy Judge, for signature on **April 26, 2021 at 12:00 p.m.**

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the Order (“Objections”), shall (i) be in writing; (ii) conform to the Federal Rules of Bankruptcy Procedure, Local Bankruptcy Rules and General Orders; (iii) specify the name of the objecting party and state with specificity the basis of the objection(s) and the specific grounds therefore; (iv) be filed in accordance with the electronic filing procedures for the United States Bankruptcy Court for the Southern District of New York, with a proof of service, and (v) be served upon (a) Baker & Hostetler LLP, Counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan, Esq., and (b) the Securities Investor Protection Corporation, 1667 K Street, NW, Suite 1000, Washington, DC 20006-1620, Attn: Kevin H. Bell, Esq., so as to be received no later than **April 26, 2021 at 11:00 a.m.**

PLEASE TAKE FURTHER NOTICE, that in the event any Objections are timely served and filed, the parties will contact the Courtroom Deputy for a hearing date and the moving party will notify other parties entitled to receive notice. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in the relief being granted or denied upon default.

PLEASE TAKE FURTHER NOTICE, that the ECF docket number to which the filing relates shall be included in the upper right hand corner of the caption of all Objections.

PLEASE TAKE FURTHER NOTICE, that if no timely Objections are served or filed
the proposed Order may be signed without a hearing.

Dated: April 19, 2021
New York, New York

By: /s/ David J. Sheehan
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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

EXHIBIT A

Proposed Order

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

**ORDER GRANTING THE TRUSTEE’S APPLICATION TO
RETAIN TRAVERS THORP ALBERGA AS SPECIAL COUNSEL**

Upon the Application of Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC, and the Chapter 7 estate of Bernard L. Madoff, for authority to retain Travers Thorp Alberga (“TTA”) as special counsel, and upon the declaration of Mr. Bhavesh Patel submitted in connection therewith, and due and proper notice having been given under the circumstances of this case, and after due deliberation,

IT IS HEREBY ORDERED THAT:

1. The Application is **GRANTED**.
2. The Court finds that TTA is deemed disinterested under 15 U.S.C. § 78eee(b)(6)(B).

3. The Trustee is authorized to retain TTA as special counsel to the Trustee as provided in the Application.